

EXHIBIT 7

To Declaration of S. Matz

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S SUPPLEMENTAL RESPONSES TO PLAINTIFF’S
FIRST REQUESTS TO LATASHA KEBE FOR THE PRODUCTION OF
DOCUMENTS AND THINGS**

COMES NOW Latasha Kebe (hereinafter referred to as “Ms. Kebe”), by and through undersigned Counsel, and hereby files her Supplemental Responses to Plaintiff’s First Requests to Latasha Kebe For the Production of Documents and Things.

Request No. 1. *Copies, in native format, of any Published Content.*

Supplemental Response to Request No. 1

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 209 – 252; 254 – 256; 258; 260; and 357 - 360.

Request No. 2. *Copies, in native format, of any Unpublished Content.*

Supplemental Response to Request No. 2

Ms. Kebe has supplemented her production with all currently unpublished videos in her possession that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 030; 039; 046; and 265 - 267.

Request No. 4. *Documents concerning the deletion of any of the Defendant Social Media Accounts (including but not limited to any communications between Kebe and a representative of a Social Media Platform).*

Supplemental Response to Request No. 4

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 170 – 178; 407; and 409 - 410.

Request No. 8. *Documents sufficient to evidence when the Lovelyti Call was made and recorded by Kebe.*

Supplemental Response to Request No. 8

After a thorough search, Ms. Kebe is unable to locate the original recording of the Lovelyti Call. Ms. Kebe no longer possesses the phone on which the call was recorded and cannot recall the application used to record the call. Ms.

Kebe estimates that the Lovelyti Call was originally recorded sometime between September of 2018 and November of 2018.

Request No. 10. *Documents concerning social media analytics for the Defendant Social Media Accounts, including but not limited to documents generated using Facebook's Insights program (re Facebook and Instagram) and the Twitter Analytics program (re Twitter), as well as documents generated from any social media management platform (e.g., Buffer, SparkCentral, or CX Social), on a monthly basis where the information is available, from the date each account was created to present.*

Supplemental Response to Request No. 10

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 179 - 186 and 268 - 332.

Request No. 12. *Documents sufficient to evidence the number of followers or subscribers for each Defendant Social Media Account, on a monthly basis where available, beginning January 1, 2018 to present.*

Supplemental Response to Request No. 12

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 268 - 311.

Request No. 13. *Documents sufficient to evidence the number of views for each Video that has been Published.*

Supplemental Response to Request No. 13

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 179 – 186; 312 – 332; and 408.

Request No. 14. *Documents sufficient to evidence the number of views for each audio-visual recording in which Plaintiff is not mentioned that was Published on a Defendant Website or Defendant Social Media Account.*

Supplemental Response to Request No. 14

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 179 – 186 and 312 - 332.

Request No. 15. *Documents sufficient to evidence the number of visitors who have viewed or visited each Defendant Website.*

Supplemental Response to Request No. 15

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates number Kebe 333.

Request No. 16. *Communications between Plaintiff and Kebe.*

Supplemental Response to Request No. 16

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 398 – 400 and 413 - 419.

Request No. 17. *Communications between Kebe and Jones.*

Supplemental Response to Request No. 17

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 334 – 336 and 420.

Request No. 19. *Documents concerning advertising on the Defendant Websites and the Defendant Social Media Accounts, including but not limited to any agreements, whether written or oral, any drafts, revisions, renewals, extensions, modifications,*

or amendments of such agreements, and any communications with a non-party advertiser.

Supplemental Response to Request No. 19

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 337 - 338.

Request No. 20. *Documents sufficient to evidence the monthly and annual gross revenue that Kebe earned from advertisements on the Defendant Websites and the Defendant Social Media Accounts from January 1, 2016 to present.*

Supplemental Response to Request No. 20

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 339 - 343.

Request No. 24. *Documents sufficient to evidence the number of subscribers, followers, and likes, for each of the Websites and Social Media Accounts alleged in Paragraphs 198 to 200 of the Counterclaims on the date the Counterclaims were filed.*

Supplemental Response to Request No. 24

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 268 - 332.

Request No. 27. *Documents concerning the alleged private conversation between Plaintiff and a person named “Skeemo” that is referenced in Paragraph 215 of the Counterclaims.*

Supplemental Response to Request No. 27

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 344 – 345 and 351 - 356.

Request No. 28. *Documents concerning any alleged threats against Kebe made by Plaintiff, “Skeemo,” or others that are referenced in Paragraphs 216, 219, 221, 229, 233, and 234 of the Counterclaims, including but not limited to copies of the alleged threats and communications with others concerning said threats.*

Supplemental Response to Request No. 28

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 006;

262 - 264; 344 - 345; 351 – 356; 366 - 367; 370; 372; 375 – 377; 381; and 384.

Request No. 29. *Documents concerning the alerts Kebe claims to have received concerning the safety of Kebe and Kebe’s family, including all communications with the “various sources”, as alleged in Paragraph 217 of the Counterclaims.*

Supplemental Response to Request No. 29

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 344 – 345 and 351 - 356.

Request No. 30. *Communications between Kebe and law enforcement representatives, including but not limited to agents of the FBI, concerning alleged threats being made against Kebe from January 1, 2018 to present.*

Supplemental Response to Request No. 30

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 347 – 348 and 401.

Request No. 31. *Documents concerning Kebe’s allegation that she changed her residence based on advice from the FBI, as alleged in Paragraph 218 of the Counterclaims.*

Supplemental Response to Request No. 31

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 192 - 208.

Request No. 32. *Documents concerning each lease for any residence that Kebe lived in from September 1, 2018 to present.*

Supplemental Response to Request No. 32

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 192 – 208 and 346.

Request No. 33. *Documents concerning Kebe's moving expenses that she incurred from September 1, 2018 to present.*

Supplemental Response to Request No. 33

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates number Kebe 346.

Request No. 34. *Documents concerning any written agreement with any moving company that Kebe contracted with to move her residence from September 1, 2018 to present.*

Supplemental Response to Request No. 34

There are no documents responsive to this request.

Request No. 35. *Communications between Kebe and any third-party, regarding Kebe changing her residence between September 1, 2018 to present.*

Supplemental Response to Request No. 35

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates number Kebe 346.

Request No. 37. *Documents concerning Kebe's allegation in Paragraphs 202, 213, 221, 229, 233, and 234 of the Counterclaims that Plaintiff is in a gang.*

Supplemental Response to Request No. 37

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 006; 009; 011 – 014; 019; 144; 349 – 350; 378 - 379; 381; 402; and 424 - 427.

Request No. 38. *Documents concerning Kebe's allegation in Paragraph 219 of the Counterclaims that her pregnancy was "high risk."*

Supplemental Response to Request No. 38

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 406; 429; and 431. Ms. Kebe is still waiting for the requested records.

Request No. 39. *Copies of Kebe’s medical and mental health records relating to any alleged harm sustained by Kebe as alleged in Paragraphs 221, 222, 226, 230, and 235, including HIPPA-compliant authorizations for each medical care provider who treated Kebe for each condition or injury claimed.*

Supplemental Response to Request No. 39

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 430 – 431. Ms. Kebe is still waiting for the requested records.

Request No. 41. *Documents concerning the allegation in Paragraph 221 of the Counterclaims that Kebe was unable to work for several weeks resulting in lost income and “other financial and emotional harms”*

Supplemental Response to Request No. 41

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 403 – 406.

Request No. 43. *Documents concerning Kebe’s allegation in Paragraph 229 of the Counterclaims that Plaintiff “intended to commit a violent injury to Ms. Kebe.”*

Supplemental Response to Request No. 43

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 006; 144; 261 - 264; 344 – 345; 349 – 356; 373 – 374; 381 – 383; 386; 390; 392 – 393; 397; 402; and 424 - 427.

Request No. 44. *Documents concerning Kebe’s allegation in Paragraphs 229 and 234 of the Counterclaims that Plaintiff “encouraged fellow gang members to ‘handle’ Ms. Kebe.”*

Supplemental Response to Request No. 44

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 006; 344 – 345; 349 – 356; 381; and 424 - 427.

Request No. 45. *Documents concerning Kebe’s allegation in Paragraph 229 of the Counterclaims that Kebe “believed that her safety and well-being was at risk” as a result of any action or statement by Plaintiff.*

Supplemental Response to Request No. 45

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 344 – 347; 351 – 356; and 424 - 427.

Request No. 47. *Documents concerning any post, tweet, or video Published by Kebe on any Social Media Account, in which she claimed that she was being stalked or harassed by any other person (including but not limited to Mr. Dennis Bryon).*

Supplemental Response to Request No. 47

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates number Kebe 422.

Request No. 48. *Documents concerning any allegation by any other person that they were being stalked or harassed by Kebe.*

Supplemental Response to Request No. 48

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 120 - 126 and 141 – 143.

Request No. 49. *Documents concerning any legal proceeding commenced by Kebe, or on behalf of Kebe, in any civil or criminal court, between January 1, 2018 and the present (including but not limited to all pleadings in such proceeding).*

Supplemental Response to Request No. 49

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 127 - 136.

Request No. 50. *Documents concerning any legal proceeding commenced against Kebe, in any civil or criminal court, between January 1, 2018 and the present (including but not limited to all pleadings in such proceeding).*

Supplemental Response to Request No. 50

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 120 - 126 and 141 – 143.

Request No. 51. *Documents concerning the allegations, affirmative defenses, and Counterclaims in this action, as set forth in the Complaint, the Amended Complaint, the Answer, and the Answer to the Amended Complaint, and any subsequent amended pleadings.*

Supplemental Response to Request No. 51

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers

Kebe 001 - 431.

Request No. 57. *Documents that Kebe intends to rely on in connection with this action.*

Supplemental Response to Request No. 57

Ms. Kebe has supplemented her production with documents that are responsive to this request via Microsoft OneDrive at Bates numbers Kebe 001 - 431.

Respectfully submitted this 23rd day of November, 2020.

/s/Sadeer Sabbak
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CERTIFICATION PURSUANT TO FRCP RULE 26(g)(1)(B)

Pursuant to Rule 26(g)(1)(B) of the Federal Rules of Civil Procedure, the undersigned certifies that the above discovery responses and objections are: (i) consistent with these rules and warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law, or for establishing new law; (ii) not interposed for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; and (iii) neither unreasonable nor unduly burdensome or expensive, considering the needs of the case, prior discovery in the case, the amount in controversy, and the importance of the issues at stake in the action.

Respectfully submitted this 23rd day of November, 2020.

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